

Tamara Giwa  
*Executive Director and  
Attorney-in-Chief*

March 28, 2025

*Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge*

Hon. Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Nicholas Truglia  
19 Cr. 921 (AKH)**

Your Honor:

With the consent of the government, I am asking that the re-sentencing for Mr. Truglia, currently scheduled for April 8, 2025, be continued for approximately three weeks.

I am making this request because there is an important issue with respect to the Presentence Report that needs to be resolved. The Final Presentence Report's Recommendation asserts that at the time of the original sentence, Mr. Truglia had "over \$39 million," even if the value of the Bitcoin wallet is not included. The PSR contends that Mr. Truglia, therefore, "had more than enough" to pay restitution even without using any money from the Bitcoin account. PSR, page 43. This alleged \$39 million of excess assets is derived, in large part, from several non-Bitcoin crypto-currency accounts that Mr. Truglia purportedly had at the time of sentencing. PSR, par. 116. However, at Mr. Truglia's sentencing, his counsel told the Court that Mr. Truglia did **not** currently own these other accounts and that they should not be included in the PSR. *11/30/2022 Sentencing Transcript* at 4.

I have spoken to both the Probation Office and Mr. Udell about this issue. Because I think this issue could impact on Mr. Truglia's re-sentencing, I believe it needs to be resolved prior to the scheduled re-sentencing. Accordingly, I am requesting a three week adjournment.

Thank you for your consideration of this application.

Respectfully submitted,



Mark B. Gombiner

Attorney for Nicholas Truglia

cc: AUSA Timothy Capozzi  
USPO Johnny Kim